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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

**JUL 12 2022**

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Case No. 18 CR-157-4

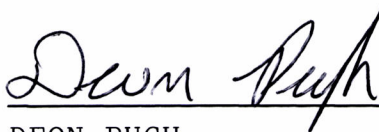
Judge John Z. Lee

DEON PUGH,  
Defendant.

NOTICE OF FILING

Defendant Deon Pugh gives notice that on July 7, 2022, he filed the enclosed letter to the Hon. John Z. Lee in the above captioned case by both depositing a copy in the MCC Chicago Legal Mail system, first class postage prepaid and addressed to the Hon. John Z. Lee and to Hon. Thomas Brutton, Clerk of the United States District Court for the Northern District of Illinois, 219 S. Dearborn St., Chicago, IL. 60604, and also by email.

Respectfully submitted,



DEON PUGH  
Defendant  
#52969-424  
Metropolitan Correctional Center  
71 W. Van Buren St.  
Chicago, IL. 60605

Deon Pugh  
#52969-424  
Metropolitan Correctional Center  
71 W. Van Buren St.  
Chicago, IL. 60605

July 7, 2022

Hon. John Z. Lee  
United States District Court  
219 S. Dearborn St.  
Chicago, IL. 60604

Re: United States v. Deon Pugh, 18 CR-157-4

Dear Judge Lee,

My attorneys, Quinn A. Michaelis and Joshua B. Adams have abandoned me. As of this date, they have presented no information whatsoever about my new trial motion or my sentencing hearing. Neither Ms. Michaelis nor Mr. Adams have conferred with me or prepared me for sentencing.

I have no idea if they filed anything on my behalf either as to new trial or sentencing. I must assume that they have not since I have yet to see any pleadings from them.

They have not informed me about the Presentence Report nor have they reviewed it with me. Consequently, they have not presented any objections I might make to that report pursuant to Federal Rule of Criminal Procedure 32, and I assert to the Court all of my rights pertaining to Federal Rule of Criminal Procedure 32.

I have wanted to speak to Ms. Michaelis and Mr. Adams of a pending Congressional bill to prohibit certain conduct in sentencing once acquitted by a jury (or presumably by a judge) of that charge or certain aspects of a charge such as drug amount. A question that I have wanted to pose to my attorneys is whether a judge's finding at trial as to drug amount will remain the same at sentencing, or will a lower standard of proof allow the judge to increase my sentence on facts not found by the judge at trial. The answer to this question bears greatly on whether I should be sentenced before the final bill passes or seek a continuance until after the Senate votes to approve or disapprove the House passed bill.

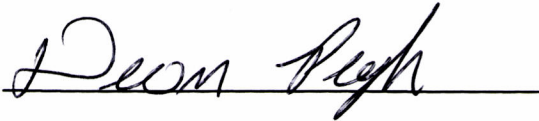
The Presentence Report recommends a guideline range of 360 months to life imprisonment based upon the amount of heroin the government believes I am accountable for, not what Your Honor found at trial.

(Letter from Deon Pugh to Hon. John Z. Lee)  
July 7, 2022

Notwithstanding this critical legal and legislative issue, still I have heard nothing from either Ms. Michaelis or Mr. Adams. Their conduct is inimical to representation of a client at a crucial stage. It is beyond reason that they would shunt me into a sentencing unprepared.

With Your Honor's due consideration, I am requesting that the Court postpone the sentencing date, allow me to file an additional motion for new trial, and a new attorney be appointed to represent me.

Respectfully submitted,

A handwritten signature in cursive script, reading "Deon Pugh", is written over a horizontal line.

DEON PUGH  
#52969-424  
Metropolitan Correctional Center  
71 W. Van Buren St.  
Chicago, IL 60605

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Metropolitan Correctional Center  
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LEGAL MAIL

Hon. Thomas Brutton  
Clerk of the United States District Court  
For the Northern District of Illinois  
219 S. Dearborn St.  
Chicago, IL 60604

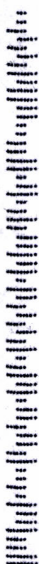
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METROPOLITAN CORRECTIONAL CENTER  
71 W. VAN BUREN ST, CHICAGO, IL 60605

The enclosed letter was processed through special mailing procedures for forwarding.

This letter has neither been opened nor inspected.

JUL 08 2022

If the writer raises a question or problem over which this facility has jurisdiction, you may wish to return the material for further information or clarification. If the writer encloses correspondence for forwarding to another addressee, please return the enclosure to the above address.